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Attorneys for Defendant
COMPUCOM SYSTEMS, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

THE CALIFORNIA LABOR AND
WORKFORCE DEVELOPMENT
AGENCY, a California governmental
agency, *ex rel.* WILLIAM DEAN
RAYMOND; and WILLIAM DEAN
RAYMOND, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

COMPUCOM SYSTEMS, INC., a
corporation; and DOES 1-15,
inclusive,

Defendants.

Case No. 2:21-cv-02327-KJM-KJN

Hon. Kimberly J. Mueller

**DEFENDANT COMPUCOM
SYSTEMS, INC.'s NOTICE OF
MOTION AND MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

Date: December 9, 2022
Time: 10:00 a.m.
Courtroom: 3

TO PLAINTIFF AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on Friday, December 9, 2022, at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 3 of the above-captioned Court, located at the Robert T. Matsui Courthouse, 501 I Street, Courtroom 3, 15th Floor, Sacramento, California 95814, Defendant CompuCom Systems, Inc., (“Defendant” or “CompuCom”) will and hereby does move this Court for an order granting Defendant’s Motion for Partial Summary Judgment, pursuant to Federal Rule of Civil Procedure 56, on one or more of the following issues:

1. Cockrell Enovation mailed a copy of CompuCom’s arbitration agreement, to William Dean Raymond’s then current and correct residential address on October 21, 2016;
2. CompuCom emailed CompuCom’s arbitration agreement to Plaintiff’s correct CompuCom work email address at “dean.raymond@compucom.com” on October 14, 2016;
3. Plaintiff’s work email “dean.raymond@compucom.com” received CompuCom’s arbitration agreement and a notice of the arbitration agreement on October 14, 2016.


Defendant’s Motion is based on this Notice of Motion and Motion for Partial Summary Judgement, the Memorandum of Points and Authorities, Statement of Undisputed Material Facts, the Declarations of Beth Forquer Ruch, Diane Chrisstoffels, John Cockrell, and Kevin Bohm filed herewith and all the exhibits attached thereto, all pleadings and papers on file in this action, and any other argument and evidence that may be presented to the Court prior to or at the hearing on this Motion.

1 The filing of this Motion follows a pre-filing meet and confer between
2 counsel to discuss the substance of this motion and potential resolution.

3 Declaration of Kevin Bohm, ¶ 2-5.

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5 Dated: November 4, 2022

MORGAN, LEWIS & BOCKIUS LLP

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7 By 
8 Barbara J. Miller
9 Samuel S. Sadeghi
10 Kevin J. Bohm
11 Attorneys for Defendant
12 COMPUCOM SYSTEMS, INC.
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